

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

UNITED STATES OF AMERICA,

CR 15-50150

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

CASEY R. LANGE,

Defendant.

The undersigned parties stipulate that the following facts are true and establish a factual basis for the plea in the action pursuant to Federal Rules of Criminal Procedure 11(b)(3):

On October 26, 2015, a Rapid City Police officer observed a vehicle make an illegal turn. The officer initiated a traffic stop. When the driver, later identified as the defendant, Casey R. Lange, rolled down the window the officer could smell marihuana. The defendant told the officer he had recently purchased marihuana so the smell was likely coming from his jacket. A check of the defendant's driver's license confirmed he had an outstanding warrant for a parole violation.

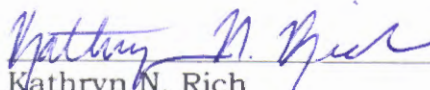
Law enforcement searched Lange's vehicle and discovered a baseball bat, digital scale, antifreeze bottle with false bottom, little baggies commonly used to break down controlled substances to sale amounts, syringes (a used one field-tested positive for methamphetamine), a total of 451 grams of

methamphetamine split in six bags, several knives, a set of brass knuckles in a false compartment in the car, a metal tin box containing a small bag of marihuana, and a thermos with meth residue inside. The defendant also had approximately \$8,665 cash.

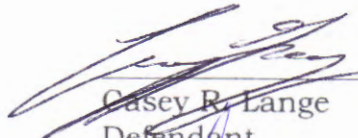
The defendant intended to sell the methamphetamine that he had in his vehicle. Methamphetamine is a Schedule II controlled substance.

RANDOLPH J. SEILER
United States Attorney

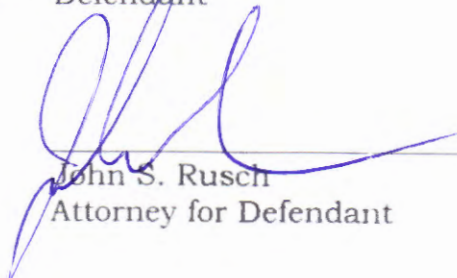
3-16-16
Date


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3-15-16
Date


Casey R. Lange
Defendant

3-15-16
Date


John S. Rusch
Attorney for Defendant